

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

| | | |
|------------------------------|---|---------------------|
| ON SEMICONDUCTOR CORPORATION |) | |
| and SEMICONDUCTOR COMPONENTS |) | |
| INDUSTRIES, LLC, |) | |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | C.A. No. 17-247-LPS |
| |) | |
| POWER INTEGRATIONS, INC., |) | |
| |) | |
| Defendant. |) | |

DEFENDANT POWER INTEGRATIONS, INC.’S
MOTIONS FOR SUMMARY JUDGMENT

Pursuant to Federal Rule of Civil Procedure 56, defendant Power Integrations, Inc. (“PI”) respectfully moves for summary judgment that:

(1) Claims 1 and 9 of ON’s U.S. Patent No. 7,102,211 (the “’211 patent”) are invalid as anticipated by Japanese Unexamined Patent Application Publication 61-53752;

(2) Claims 1, 4, 9, and 10 of the ’211 patent are invalid as obvious in view of Japanese Unexamined Patent Application 62-45054 and the admitted prior art;

(3) The accused eSOP products do not infringe claims 1, 4, 9, or 10 of the ’211 patent because ON failed to prove that those products meet the limitation “discrete leads each having an end extending near the island”;

(4) The accused products do not infringe the asserted claims of the ’211 patent under the doctrine of equivalents because ON has failed to provide any particularized testimony on how the accused products infringe;

(5) ON infringes the asserted claims of PI's U.S. Patent No. 6,107,851 (the "'851 patent") and these claims are not invalid, due to issue preclusion;

(6) Use of PI's accused products with a rectifying diode does not infringe the asserted claims of ON's U.S. Patent Nos. 7,440,298, 7,564,705, and 7,796,407 (the "SR patents");

(7) PI does not infringe the asserted claims of the SR patents based on the Court's claim construction;

(8) ON is not entitled to damages before December 27, 2016 for the '298 and '705 patents;

(9) ON has provided no evidence of infringement for overseas sales before PI's first awareness of the asserted patents; and that

(10) ON Semiconductor Corporation ("ON Corp.") lacks standing.

WHEREFORE, PI respectfully requests that the Court grant these motions, the grounds for which are fully set forth in PI's opening brief in support of the motions, and enter the proposed order attached hereto.

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Dated: August 6, 2019

/s/ John W. Shaw

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